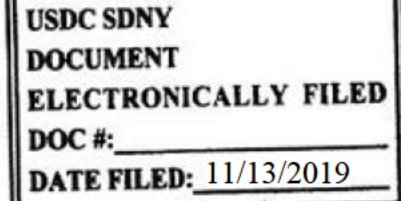


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ATTORNEYS & COUNSELORS



November 13, 2019

**VIA ECF and EMAIL:** [Torres NYSDChambers@nysd.uscourts.gov](mailto:Torres NYSDChambers@nysd.uscourts.gov)

Honorable Judge Analisa Torres  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Bowen v. Knolls Company, et al.**  
**SDNY Case No.: 19-cv-08759**

Dear Judge Torres,

This office represents the Plaintiff, Daniel Bowen, in the above-captioned case. An initial pre-trial conference is scheduled for November 20, 2019 at 10:40 a.m.

At this time, service is still being attempted on Defendant, Knolls Company, and Defendant, Fresh King Market Inc., was served on September 24, 2019 with its answer therefore due on October 15, 2019. To date, Defendant, Fresh King Market, Inc., has not made an appearance or filed a responsive pleading. Plaintiff is attempting to contact the served Defendant so it can participate and avoid a default. As such, Plaintiff respectfully requests that this Court adjourn the conference to an alternate date and time to allow Defendants to make an appearance or for Plaintiff to move for a default against the Defendant, Fresh King Market Inc. This is our first request for an adjournment of this conference, and the request will not prejudice any parties or affect any other scheduled dates.

We thank the Court for your time and consideration in this matter.

Respectfully Submitted,


**Law Offices of Nolan Klein, P.A.**

GRANTED. The initial pretrial conference scheduled for November 20, 2019 is ADJOURNED to **December 4, 2019**, at **11:20 a.m.** By **November 27, 2019**, the parties shall submit their joint letter and proposed case management plan, or, in the event that Defendant has not been reached, Plaintiff shall file a letter stating its efforts to reach Defendant.

By: /s/ Hector V. Ramirez  
HECTOR V. RAMIREZ, ESQ.  
(HR3270)

SO ORDERED.

Dated: November 13, 2019  
New York, New York

  
\_\_\_\_\_  
ANALISA TORRES  
United States District Judge